

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

RANDALL CRATER,

Defendant.

)
)
)
)
)
)
)

Criminal No.: 19-10063-DJC

JOINT INITIAL STATUS REPORT

Pursuant to Local Rule 116.5(a), the parties hereby file the following initial status report prepared in connection with the initial status conference scheduled for May 8, 2019:

(1) Automatic Discovery/Pending Discovery Requests

The government provided automatic discovery to the Defendant on April 18, 2019 and April 25, 2019.

(2) Additional Discovery

The government anticipates providing additional discovery in the next 30 days, which will include additional search warrant returns, including returns that are still being processed, as well as other materials recently received by the government.

(3) Timing of Additional Discovery Requests

The Defendant is reviewing the discovery provided by the government and the parties expect additional discovery to be produced in the next 30 days. Accordingly, it is premature to decide what, if any, discovery requests will be made.

(4) Protective Orders

On April 17, 2019, the Court entered an agreed upon protective order (Doc. #19), which applies to all discovery produced by the government.

(5) Pretrial Motions

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The government agrees to provide any expert witness disclosures 30 days prior to trial. The Defendant agrees to provide any expert witness disclosures 21 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded between the Defendant's initial appearance and arraignment on March 20, 2019 through the date of the initial status conference on May 8, 2019. (Doc. #14.)

(8) Interim Status Conference

The parties respectfully request that the Court schedule an Interim Status Conference to occur in approximately 45 days from the Initial Status Conference, or as soon thereafter as is convenient for the Court and ask that the time between the Initial Status Conference and the Interim Status Conference be excluded from all Speedy Trial calculations.

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

Date: May 2, 2019

By: /s/ Jordi de Llano
Jordi de Llano
Assistant U.S. Attorney

/s/ Caitlin R. Cottingham
Caitlin R. Cottingham
Trial Attorney

Date: May 2, 2019

By: /s/ Ian Gold
Ian Gold
Counsel for Randall Crater

CERTIFICATE OF SERVICE

I, Jordi de Llano, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: May 2, 2019

/s/ Jordi de Llano
Assistant United States Attorney